## UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS EL PASO DIVISION

ROBERT K. HUDNALL,	§	
	§	
Plaintiff,	§	
	§	
V.	§	Civil Action No. 3:22-cv-00036-KC
	§	
CITY OF EL PASO, ALEJANDRO	§	
C. RAMIREZ, and TYRONE SMITH,	§	
dba as SMITH AND RAMIREZ	§	
RESTORATION LLC.	§	
	§	
Defendants.	§	

## JOINT MOTION FOR EXTENSION OF DEADLINE TO FILE JOINT REPORT OF PARTIES' PLANNING MEETING

TO THE HONORABLE UNITED STATES DISTRICT COURT JUDGE:

COME NOW, Plaintiff, ROBERT K. HUDNALL and Defendants ALEJANDRO C. RAMIREZ, and TYRONE SMITH d/b/a as SMITH AND RAMIREZ RESTORATION LLC, in the above-entitled and captioned cause and submit this Joint Motion for Extension of Deadline to file Joint Report of Parties' Planning Meeting and would show the Court as follows:

- 1. On August 31, 2022, the Court entered its Order Requiring Parties to File Joint Report of Parties' Planning Meeting (ECF No. 51) requiring (a) parties to file Joint Report of Parties' Planning Meeting by September 14, 2022.
- 2. The parties have conferred, however they have not been able to reach an agreement on the dates. The Joint Parties Planning Meeting and Scheduling Order will be filed by Tuesday, September 20, 2022.
- 3. The parties request the deadline set forth in the Court's Order Requiring Parties to File Joint Report, Proposed Scheduling Order and Disclosure Statement [ECF No. 51] be extended as follows:

- a. **September 21, 2022** Parties to file the Joint Report and Planning Meeting and Discovery Control Plan and Scheduling Order.
- 4. This Joint Motion is not made for purposes of delay but so that justice may be served.

WHEREFORE, PREMISES CONSIDERED, the parties respectfully request that the Court grant this Joint Motion, that it extend the deadlines to allow the parties additional time to appropriately prepare, act upon and present the documents to the Court, and for such other relief to which the parties may be justly entitled to receive.

Respectfully submitted,

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By: /s/ Robert K. Hudnall (w/permission via email)

Robert K. Hudnall
Plaintiff Pro Se

-AND-

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By: /s/ James A. Martinez

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